IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

JANE DOE, individually and on behalf of all others similarly situated,

Plaintiff,

v.

Case Number: 1:22-cv-10019-JSR

JPMORGAN CHASE BANK, N.A.

Defendant/Third-Party Plaintiff,

v.

JAMES EDWARD STALEY

Third-Party Defendant.

GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.

Defendant/Third-Party Plaintiff,

v.

JAMES EDWARD STALEY

Third-Party Defendant.

Case Number: 1:22-cv-10904-JSR

THIRD-PARTY DEFENDANT JAMES STALEY'S LOCAL RULE 56.1 STATEMENT OF UNDISPUTED MATERIAL FACTS IN SUPPORT OF SUMMARY JUDGMENT

I. PARTIES

1. James E. "Jes" Staley (Mr. Staley) worked at JPMorgan Chase Bank, N.A. from 1979 to 2013 and held several senior positions in the later part of his tenure.

2. JPMorgan Chase Bank, N.A. (JPMorgan) is a national bank whose main office is located in Columbus, Ohio, as designated in its Articles of Association.

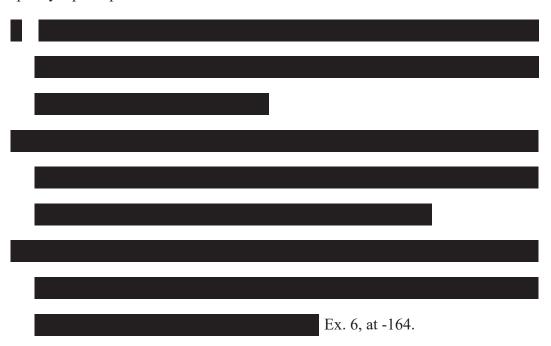
II. STALEY'S TENURE AT JPMORGAN

- 3. Mr. Staley became head of JPMorgan's Private Bank in 1999. Ex. 1, at 27:24-28:3.
- 4. Ex. 2, at 45:18-47:8; 78:21-79:12.
- Ex. 2, at 45:18-50:14;

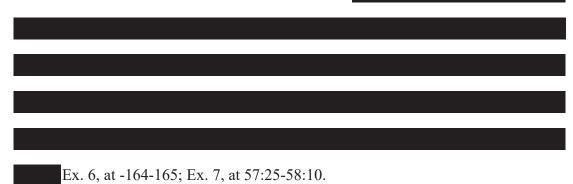
 248:16-249:1.
- 6. Mr. Staley did not have a relationship with Epstein before meeting with him in or around 2000. Ex. 2, at 45:18-50:14.
- 7. Mr. Staley became CEO JPMorgan's Asset and Wealth Management division in 2001. Ex. 2, at 11.
- 8. Mr. Staley became CEO of JPMorgan's Investment Bank in 2009. Ex. 2, at 11:16-12:6.
- 9. Mr. Staley ended his employment with JPMorgan in January 2013. Ex. 3.
- 10. Epstein introduced Mr. Staley Ex. 2, at 86:19-88:4.
- 11. Epstein introduced Mr. Staley Ex. 2, at 86:19-88:13.
- 12. Epstein introduced Mr. Staley Ex. 2, at 86:19-87:6.
- 13. Mr. Staley used his corporate email account to communicate with Epstein. Ex. 2, at 254:4-21, 385:5-12; Ex. 4, at -1998-2019.

III. RELEVANT POLICIES AND PRACTICES AT JPMORGAN

- 14. At the relevant times, JPMorgan had policies implementing its Anti-Money Laundering (AML) and Sponsorship Policies known as the Anti-Money Laundering/Know Your Client Policy (KYC). Ex. 5, at -9752; Ex. 6, at -162-163.
- 15. The policy's principles included that:



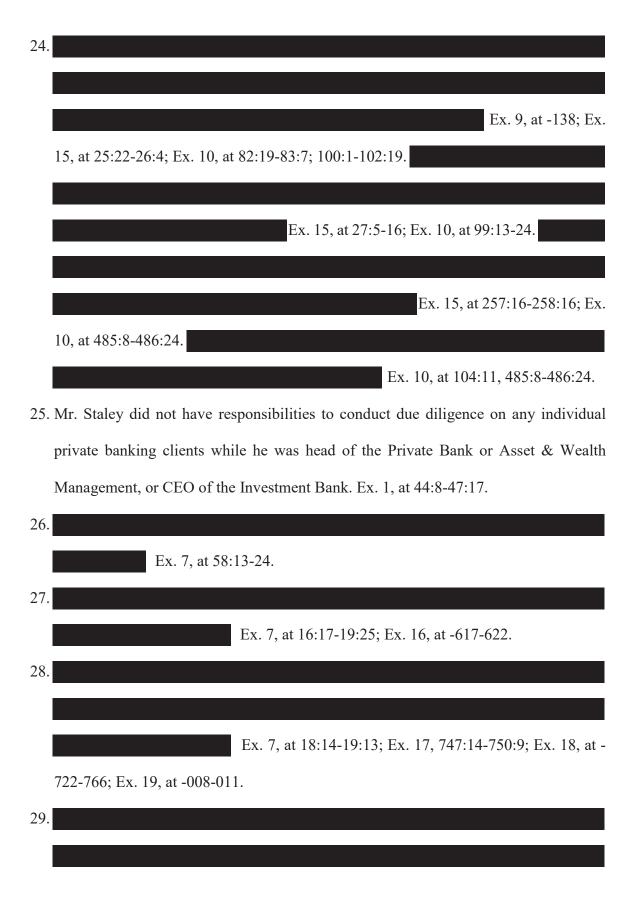
16. The client sponsorship policy required generally that

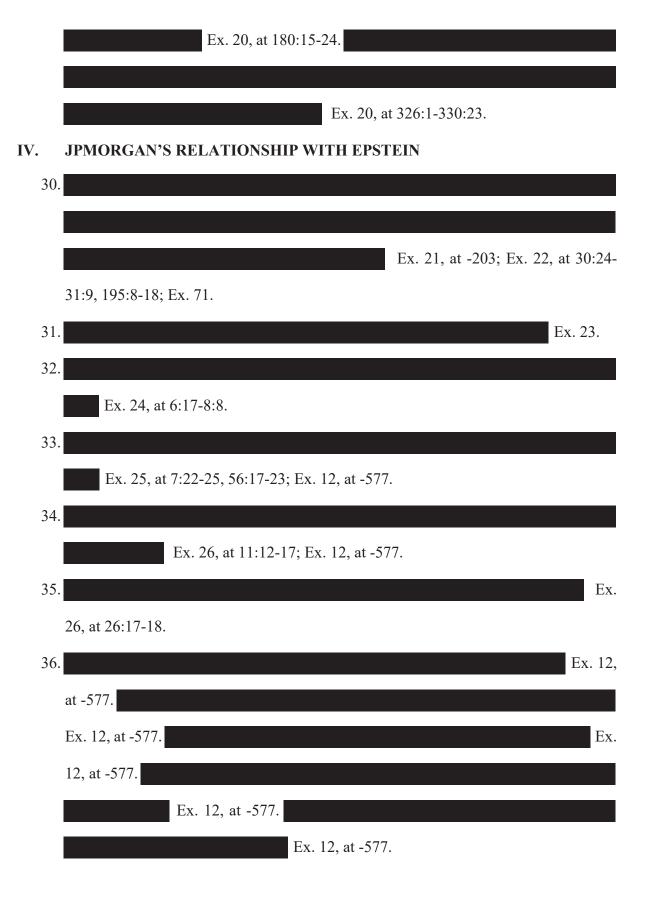


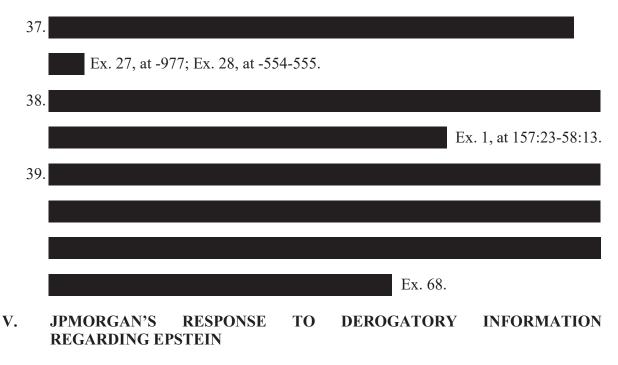
17. The due diligence outlined in the policy required that

	Ex. 6, at -164-167; Ex. 8, at 61:9-24; Ex. 9,
	at-1937; Ex. 10, at 155:20-157:7.
18	
	Ex. 6, at -0170; Ex. 8, at 79:14-80:2; Ex. 10, at 461:9-16;
	Ex. 7, at 54:20-23.
	Ex. 7, at 54:16-19; Ex. 11, at -570.
19	
	Ex. 6, at -164; Ex. 12, at -576; Ex. 13, at -159.
20.	. JPMorgan had additional policies and procedures for clients who were designated "high
	risk." Ex. 11.

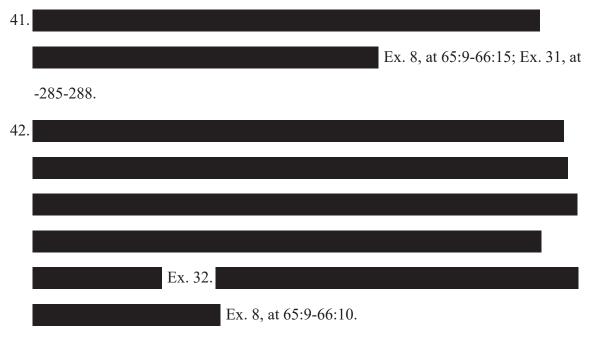
21.
Ex. 6, at -170; Ex. 1, at 88:19-89:19.
22. Risk management and compliance also had account monitoring roles at least for high-
risk clients. Ex. 11, at -571; Ex. 14, at -938-939.
Ex. 11, at -571.
23. JPMorgan's policy for identifying and investigating unusual or suspicious activity
instructed that
Ex. 9, at -134.
Ex. 9, at -134.



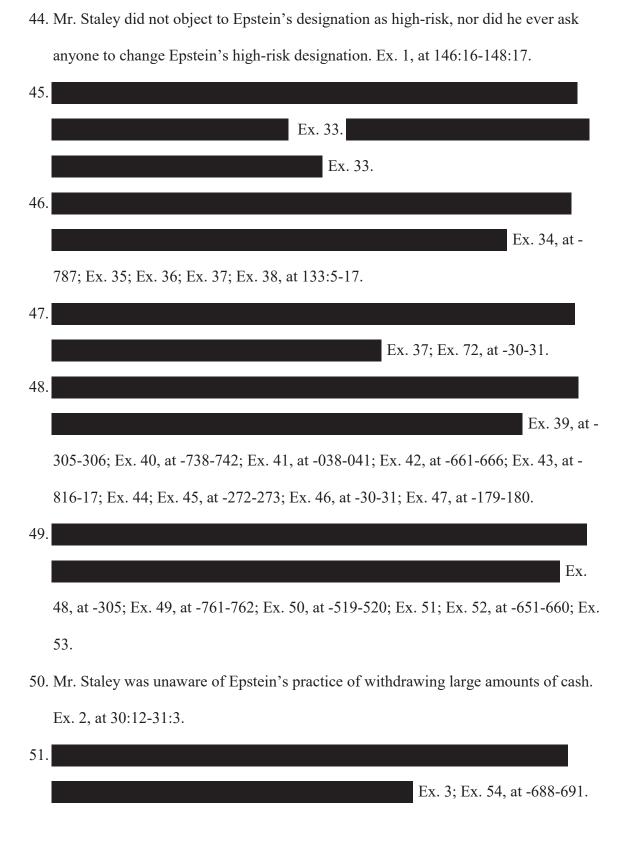


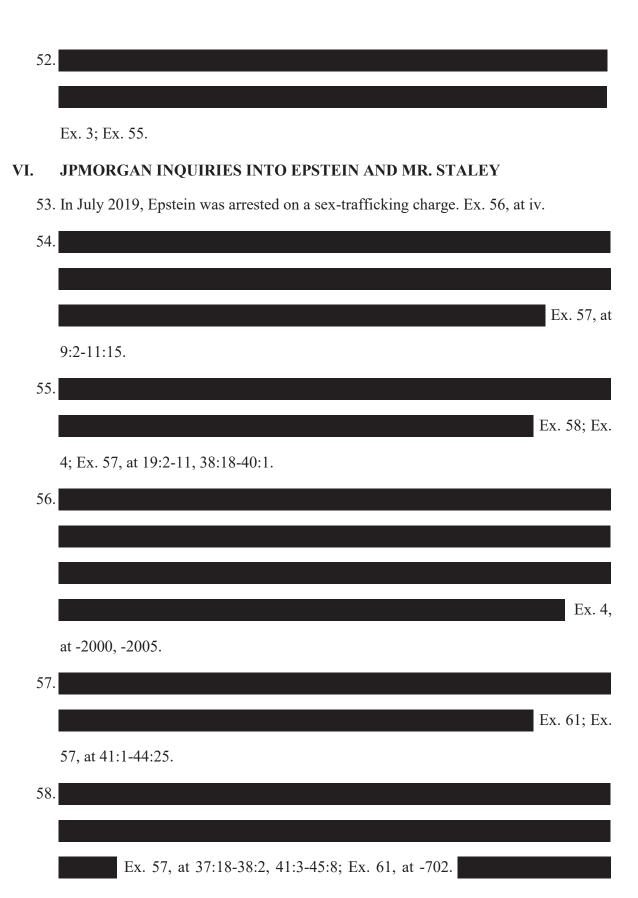


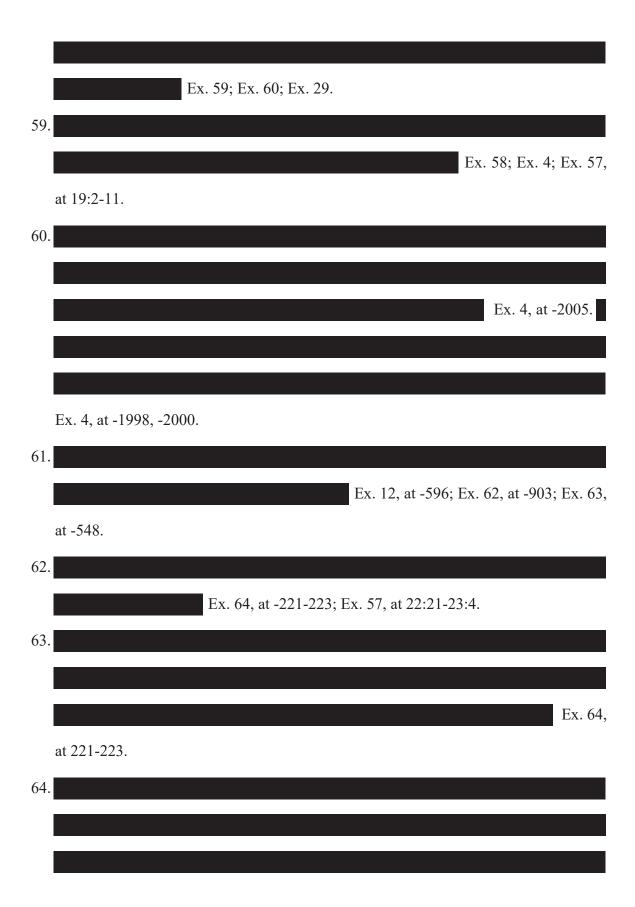
40. Epstein was indicted in Florida state court for felony solicitation of prostitution on July 19, 2006. Ex. 30.

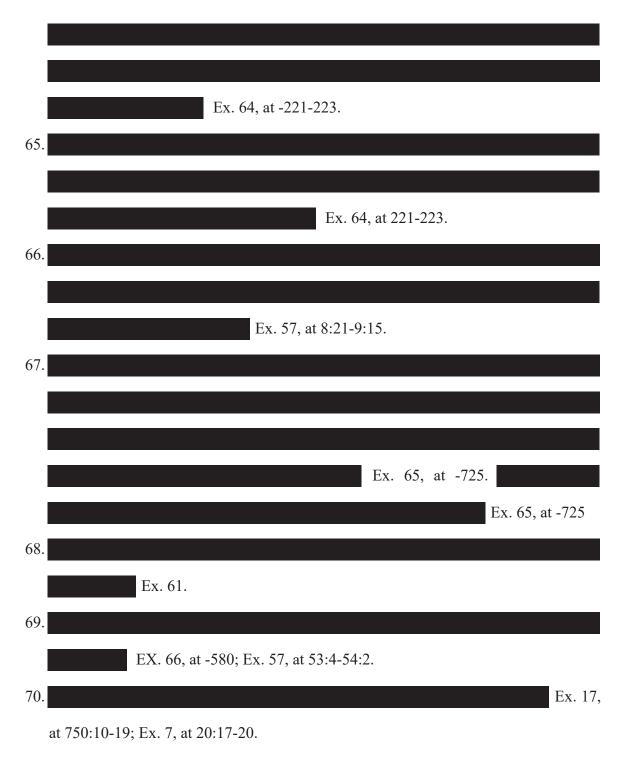


43. Mr. Staley did not object to the determination of keeping Epstein solely as a banking client and on a reactive, client service basis. Ex. 8, at 386:5-390:2; Ex. 2, at 123:13-25.









VII. THE CURRENT LITIGATION

71. JPMorgan did not sue Mr. Staley before 2023. Ex. 67.

72. JPMorgan sued Mr. Staley in 2023, after it was sued by the Government of the U.S.

Virgin Islands and the Jane Doe plaintiff. Ex. 67.

73. The bank has identified seven instances starting in "late 2009 or early 2010" in which

Mr. Staley allegedly "vouch[ed]" for Epstein's character and conduct. Ex. 68.

74. The alleged "vouching" lists Mr. Staley telling other bank employees things like "that

he knew and trusted Epstein"; that Epstein "had paid his debt to society"; and that Mr.

Staley had "a good relationship with him." Ex. 68.

75. The bank does not contend that Mr. Staley was aware of Jeffrey Epstein's alleged sex

trafficking. Ex. 69.

76. Mr. Staley's asserted vouching for Epstein did not violate any policy at the bank. Ex.

1, at 112:4-22.

77. The bank originally sought reputational damages, but it has dropped any claim to such

damages. Ex. 70, at 8-9.

78. JPMorgan seeks "the amount JPMorgan will pay to the [Doe class] to settle this

action, in the amount of \$290,000,000.00." Ex. 70, at 9.

Date: August 25, 2023

Respectfully submitted,

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